

From: Marc Bowman <Marc.E.Bowman@mwhglobal.com>
Sent: Monday, September 16, 2013 3:16 PM
To: Rochlin, Kevin
Cc: Sheldrake, Beth; Greutert, Ed [USA]; Barbara Ritchie; Kelly Wright; susanh@ida.net; Bruce.Olenick@deq.idaho.gov; Douglas.Tanner@deq.idaho.gov; Scott.Miller@deq.idaho.gov; Rob Hartman; Jeff Hamilton; Marguerite Carpenter; David Heineck
Subject: FMC Plant OU RDRA Monthly Report #3 - August 2013
Attachments: 2013-09-16 FMC Plant OU RDRA Order Monthly Report #3 - August 2013.pdf

Follow Up Flag: Follow up
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Categories: 11-19 to 1-10 2014

Kevin:

Please find attached the RDRA Monthly Report #3 for August 2013 as required under Paragraph 55 of the FMC Plant OU RDRA Unilateral Administrative Order reporting on the status of implementation of the Remedial Design/Remedial Action work. This report covers the time period between August 1, 2013 and August 31, 2013.

Please call if you have any questions or have trouble opening the attached pdf document.

Marc Bowman
MWH Americas, Inc.
(801) 617-3234



Via email

September 16, 2013

Kevin Rochlin
Remedial Project Manager, Superfund Program
US EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

RE: MONTHLY REPORT NO. 3 - AUGUST 2013

FMC Operable Unit of the Eastern Michaud Flats Superfund Site
Unilateral Administrative Order for Remedial Design and Remedial Action
Docket No. CERCLA-10-2013-0116

Dear Mr. Rochlin,

This is the monthly report concerning the FMC Plant OU (the site) submitted pursuant to Paragraph 55 of the subject Unilateral Administrative Order for Remedial Design and Remedial Action (UAO), effective June 20, 2013. This report describes the time period between August 1, 2013 and August 31, 2013.

a) ACTIONS TAKEN DURING THE TIME PERIOD:

- Submitted deliverables (listed in item c below) and began preparation of deliverables (listed in item d below) as required based on the effective date of the subject UAO

b) SUMMARY OF SAMPLING RESULTS AND DATA RECEIVED DURING THE TIME PERIOD

- None

c) PLANS, REPORTS AND OTHER DELIVERABLES SUBMITTED DURING THE TIME PERIOD

- August 12, 2013 Remedial Design Work Plan (RDWP) required pursuant to Paragraph 30.a. of the UAO
- August 26, 2013 response to EPA, IDEQ and Shoshone-Bannock Tribes comments on the 2013 Gamma Cap Thickness Effectiveness Performance Test Work Plan (GCWP) required pursuant to Paragraph 30.d.2.bb. of the UAO

d) ACTIONS SCHEDULED FOR THE NEXT TWO MONTHS

- EPA approval of the GCWP (received on September 5, 2013)
- Implementation of the EPA-approved GCWP (began field work on September 11, 2013, pursuant to GCWP and FMC's September 9, 2013 letter). Subsequent IDEQ comments on the GCWP (and the Remedial Design Work Plan) were received on September 10, 2013 and responses provided to EPA September 16, 2013.
- Prepare and submit responses to agency comments received on the Data Gap Work Plan (DGWP) and prepare for timely implementation of this work plan following EPA approval on the schedules included in the work plan (EPA and IDEQ comments received on September 10, 2013 and response to comments submitted to EPA on September 12, 2013)
- Prepare and submit responses to agency comments received on the Extraction Zone Hydrogeologic Study Work Plan (HGWP) and prepare revisions to the HGWP as may be necessary to address those comments (EPA and Shoshone-Bannock Tribes comments received on September 13, 2013 and IDEQ comments received on September 16, 2013)
- Prepare and submit responses to agency comments when received on the RDWP
- Prepare and submit certification required under Paragraph 54 of the UAO (submitted on September 9, 2013)
- Prepare and submit financial assurance / performance guarantee required under Paragraph 67 of the UAO (submitted on September 4, 2013)
- Notification of off-site shipment of waste materials required under Paragraph 35 of the UAO (submitted on September 12, 2013)

e) UNRESOLVED DELAYS ENCOUNTERED OR ANTICIPATED THAT MAY AFFECT THE SCHEDULE FOR IMPLEMENTATION OF WORK AND EFFORTS TO MITIGATE

- Received EPA approval of the GCWP 20 business days after the baseline anticipated approval date as presented in the RDWP baseline schedule (Table 6-1). EPA approval of the DGWP remains pending. Comments on the HGWP will require response as well as modification to the work plan. Impacts to the soil RD/RA schedule are discussed in item f below.

f) MODIFICATIONS TO WORK PLANS OR SCHEDULES PROPOSED

- Attached are the updated RD/RA Preliminary Schedules for soil and groundwater remedies (Revision 1.0 to Tables 6-1 and 6-2 of the RDWP). The updates to the soil remedy preliminary schedule are based upon the actual approval dates for

deliverables submitted to date and the anticipated approval of the DGWP later this week due to the limited comments received. While the revised plan dates are somewhat delayed, the schedule continues to forecast commencement of construction on the soil remedy in the 2014 construction season.

- The preliminary schedule for the groundwater remedy has been adjusted to reflect receipt of all agency comments today (September 16, 2013). However, due to the scope of those comments, which will give rise to revision of the HGWP, FMC has adjusted the schedule to reflect submittal of response to agency comments and a revised HGWP on October 16, 2013 (30 days from receipt of comments) and a forecast of EPA approval on approximately October 30, 2013. To the extent that implementation of the HGWP (based on the scope initially proposed in FMC's July 15, 2013 draft) would be expected to require 75 days of field work, commencement of this work at the close of the Pocatello construction season is not feasible. Coupled with additional work requested in agency comments which could extend the duration of the implementation of the HGWP, FMC has not yet forecasted dates as to when this field work would commence in 2014. A revised preliminary schedule for the groundwater remedy will be developed and included in the revised HGWP to be submitted for agency review and approval on October 16, 2013.

If you have any questions concerning the monthly report, please feel free to call Marc Bowman at (801) 617-3234, Rob Hartman at (801) 617-3256, or Barbara Ritchie at (215) 299-6700.

Sincerely,



Marc Bowman
Project Director
MWH Americas, Inc.



Rob Hartman
RD Manager
MWH Americas, Inc.

cc: (as required under the UAO)

Bruce Olenick, IDEQ

Doug Tanner, IDEQ

Scott Miller, IDEQ

Kelly Wright, Shoshone-Bannock Tribes

Susan Hansen, Shoshone-Bannock Tribes

Soil Remedial Design / Remedial Action Preliminary Schedule (Rev 1)

RD Deliverable/Work Element	Schedule per UAO	RDWP Table 6.1 Planned	Revised Plan	Actual
Remedial Design Work Plan				
Submit Remedial Design Work Plan (RDWP)	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013	9/20/2013	
Submit Final RDWP	14 days or as specified by EPA	9/27/2013	10/4/2013	
EPA Approval RDWP	NS	10/14/2013	10/21/2013	
Performance Testing (PT) Work Plans - Soil Remedy				
RD Data Gap (DG) Acquisition Work Plan	W/in 60 days EPA approval SC			7/15/2013
Gamma Cap (GC) Performance Evaluation Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA contingent approval of GC WP	NS	8/16/2013		9/5/2013
EPA contingent approval of DG WP	NS	8/16/2013	9/20/2013	
Execute PTs to Support Soil Remedial Design				
PT Field Work	Per DG/GC Work Plans	8/26 to 9/27/2013	9/11/ to 10/21/2013	
Submit GC / DG PT Reports	Per DG/GC Work Plans	10/25/2013	11/25/2013	
EPA Comments on DG/GC PT Reports	NS	11/22/2013	12/23/2013	
Submit Final DG/GC PT Reports	14 days or as specified by EPA	11/29/2013	12/30/2013	
EPA approval DG/GC PT Reports	NS	12/16/2014	1/13/2014	
Remedial Design - Soil Remedy				
Submit Soil Remedy - 30% Design Package	45 days after EPA approval of GC/DG PT reports	1/27/2014	2/25/2014	
EPA Comments on 30% RD Package	NS	3/6/2014	3/25/2014	
Submit Soil Remedy Pre-Final (90/95%) RD Package	120 days after receipt of EPA comments on 30% RD	5/1/2014	5/20/2014	
EPA Comments on Pre-Final RD Package	NS	5/29/2014	6/17/2014	
Submit Soil Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	6/26/2014	7/15/2014	
Remedial Action Work Plan - Soil Remedy				
Submit Draft RAWP Soil Remedy	Concurrent with Pre-Final RD	5/1/2014	5/20/2014	
EPA Comments on RAWP Soil Remedy	NS	5/29/2014	6/17/2014	
Submit Final RAWP Soil Remedy	Concurrent with Final RD	6/26/2014	7/15/2014	
Remedial Contractor Procurement				
Bid Package Preparation - Soil Remedy	NS	5/5/2014	5/26/2014	
Evaluate Bids / Recommendation	NS	6/26/2014	7/16/2014	
EPA Approval Soil Remedy Final RD and RAWP	NS	7/7/2014	7/24/2014	
Soil Remedial Action				
Award RA Contract	45 days after EPA approval RAWP	7/10/2014	7/29/2014	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	7/17/2014	8/5/2014	
Start of Soil Remedy Construction	15 days after Pre-Con Meeting	7/28/2014	8/14/2014	
Institutional Control Program				
Institutional Control Implementation and Assurance Plan	Submit with 30% RD for Soil RA	1/27/2014	2/25/2014	
EPA Comments on ICIAP	NS	4/28/2014	5/26/2014	
Submit Final ICIAP	14 days or as specified by EPA	5/12/2014	6/9/2014	
EPA Approval ICIAP	NS	6/11/2014	7/10/2014	
Implement ICIAP	Per ICIAP			

NS means no schedule (timeframe) specified in UAO.

Groundwater Remedial Design / Remedial Action Preliminary Schedule (Rev 1)

RD Deliverable/Work Element	Schedule per UAO	RDWP Table 6.2 Planned	Revised Plan	Actual
Remedial Design Work Plan				
Submit Remedial Design Work Plan	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013	9/20/2013	
Submit Final RDWP	14 days or as specified by EPA	9/27/2013	10/4/2013	
EPA Approval RDWP	NS	10/14/2013	10/21/2013	
Performance Testing (PT) Work Plans - Groundwater Remedy				
Groundwater Extraction Zone Hydrogeologic (EZH) Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA Comments on GW EZH Work Plan	NS	8/16/2013		9/16/2013
Submit Final Groundwater EZH Work Plan	14 days or as specified by EPA	Not included	10/16/2013	
EPA approval of Groundwater EZH Work Plan	NS	8/16/2013	10/30/2013	
Execute PTs to support Groundwater (GW) Remedial Design				
PT Field Work	Per GW EZH Work Plan	8/26 to 11/8/2013	TBD	
Submit GW EZH Report	Per GW EZH Work Plan	1/10/2013	TBD	
EPA Comments on GW EZH Report	NS	2/7/2014	TBD	
Submit Final GW EZH Report	14 days or as specified by EPA	2/14/2013	TBD	
EPA approval GW EZH Report	NS	2/28/2013	TBD	
Remedial Design - Groundwater Remedy				
Submit Groundwater Remedy - 30% Design Package	45 days after EPA approval of GW EZH Report	3/24/2014	TBD	
EPA Comments on 30% RD Package	NS	4/21/2014	TBD	
Submit Groundwater Remedy - 60% Design Package	90 days after EPA comments on 30% RD	7/21/2014	TBD	
EPA Comments on 60% RD Package	NS	8/22/2014	TBD	
Submit Pre-Final (90/95%) Groundwater RD Package	90 days after receipt of EPA comments on 60% RD	10/24/2014	TBD	
EPA Comments on Pre-Final RD Package	NS	11/24/2014	TBD	
Submit Groundwater Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	12/15/2014	TBD	
Remedial Action Work Plan - Groundwater Remedy				
Submit Draft RAWP Groundwater Remedy	Concurrent with Pre-Final RD	10/24/2014	TBD	
EPA Comments on RAWP	NS	11/24/2014	TBD	
Submit Groundwater Remedy Final RAWP	Concurrent with Final RD	12/15/2014	TBD	
Remedial Contractor Procurement				
Bid Package Preparation Groundwater Remedy	NS	10/30/2014	TBD	
Evaluate Bids / Recommendation	NS	12/19/2014	TBD	
EPA Approval Groundwater Remedy Final RD and RAWP	NS	1/15/2015	TBD	
Groundwater Remedial Action				
Award RA Contract - Groundwater	45 days after EPA approval RAWP	3/1/2015	TBD	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	3/31/2015	TBD	
Start of Construction	15 days after Pre-Con Meeting	4/14/2015	TBD	

NS means no schedule (timeframe) specified in UAO.